

Name: William X Nietzsche
Address: 404406 N. Mississippi Ave
Portland Oregon 97217
Phone: 503-539-3784

FILED 13 DEC 18 15:38 USDC-ORP

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

PORTLAND DIVISION

William X Nietzsche, et al

Plaintiff(s),

Case No:

vs.

3:18-cv-01930-SI

Freedom Home Mortgage Corporation, et al

Defendant(s).

NOTICE OF REMOVAL PURSUANT TO
28 USC § 1446 FILED IN
MULTNOMAH COUNTY COURT ON
12/12/2018.

INFERIOR COURT CASE # 18LT16339 has
been removed to this Federal claim.

Dated: 12/13/2018

Jeff K. Hickey
Attn: Right Reserve, Dkt.

ORIGINAL

IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR MULTNOMAH COUNTY

URBAN HOUSING DEVELOPMENT, LLC.) Case # 18LT16339
V.)
William Kinney Jr.) NOTICE OF REMOVAL
Julie A M Kinney) PURSUANT TO 28 USC § 1446
And ALL OTHERS)
-----)
Julie Metcalf Kinney,)
William Kinney Jr,)
Counter-Plaintiff(s),)
And,)
William X Nietzche (solely as trustee for)
KRME International Trust),)
Third-party Intervenor,)
V.)
URBAN HOUSING DEVELOPMENT LLC,)
Roman Ozeruga,)
Mark G. Passanante,)
Counter-Defendants.)

2018 DEC 12 AM 9:09
FILED
CLERK, MULTNOMAH COUNTY
COURT

NOTICE OF REMOVAL

Counter-plaintiffs hereby gives notice of removal pursuant to 28 US. Code § 1446 and rule 11 of the Federal Rules of Civil Procedure, stating in support:

1. Counter-plaintiff filed a verified federal complaint which is pending regarding the same set of law and facts as pertaining to this matter.
2. The case # to said verified complaint is 3:18-cv-01930-SI.
3. Counter-defendant Urban Housing Development has submitted an appearance in federal court regarding said verified complaint.
4. This court lacks subject matter jurisdiction.

WHEREFORE, Counter-Plaintiff prays this court will grant Counter-Plaintiffs extension of time of (60) days.

/////////

RESPECTFULLY DATED this 17th day of December, 2018.

By Julie Ann Metcalf Kinney

Julie Ann Metcalf Kinney
In Solo Proprio, In Proper Persona,
Sui Heredes, Sui Juris [Pro se]